

**Before the Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of:

|  |   |                             |
|--|---|-----------------------------|
| <b>COMMENT SOUGHT ON STREAMLINING</b>                    | ) |                             |
| <b>DEPLOYMENT OF SMALL CELL INFRASTRUCTURE</b>           | ) | <b>WT Docket No. 16-421</b> |
| <b>BY IMPROVING WIRELESS FACILITIES SITING POLICIES;</b> | ) |                             |
| <b>MOBILITIE, LLC PETITION FOR DECLARATORY RULING</b>    | ) |                             |

To: Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

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February 3, 2017

Dear FCC Commissioners,

Please do not further preempt local authority over zoning and lease negotiation. 5G is an unsustainable and dangerous technology. It will do great harm to human health and the environment.

Contrary to industry representations, **wireless technology is neither a sustainable nor environmentally-friendly technology** because wireless connectivity uses far more energy than wired connectivity. According to *Energy Consumption in Wired and Wireless Access Networks*, “**Wireless technologies will continue to consume at least 10 times more power than wired technologies** when providing comparable access rates and traffic volumes. PON [passive optical networks] will continue to be the most energy-efficient access technology.” (<http://people.eng.unimelb.edu.au/rtucker/publications/files/energy-wired-wireless.pdf>). A paper looking at the energy consumption of cloud computing states, “**Our energy calculations show that by 2015, wireless cloud will consume up to 43 TWh**, compared to only 9.2 TWh in 2012, an increase of 460%. This is an increase in carbon footprint from 6 megatonnes of CO2 in 2012 to up to 30 megatonnes of CO2 in 2015, **the equivalent of adding 4.9 million cars to the roads**. Up to **90% of this consumption is attributable to wireless access network technologies**, data centres account for only 9%.” (<http://www.ceet.unimelb.edu.au/publications/ceet-white-paper-wireless-cloud.pdf>) It is clear from the discussion that cloud computing does not save energy unless it displaces local computing power, otherwise it just increases energy consumption, especially when accessed wirelessly. The FCC ought to be focusing on providing quality wired broadband nationwide to protect health and the environment and promote sustainability.

There has been no NEPA review of the environmental and human health impacts of moving forward with 5G. The FCC has put the cart before the horse in seeking to preempt local zoning authority to promote 5G without first studying the safety of 5G for humans and the environment. There is consensus within the scientific community that the existing FCC limits for wireless radiation do not protect the population from biological effects ([www.EMFscientist.org](http://www.EMFscientist.org))

**At least three federal agencies have indicated that the FCC radiofrequency (RF) radiation limits with which wireless technology must comply are not protective of either human health or the environment during the chronic non-thermal exposures ubiquitously present today.**

**The U.S. National Toxicology Program** recently released results showing that radiofrequency radiation (RFR) can indeed both break DNA and cause cancer. A replicated European study has found that RFR is also a cancer promoter (<http://ehtrust.org/science/facts-national-toxicology-program-cellphone-rat-cancer-study/>). Furthermore, the literature on RFR in the very high frequency bands required for 5G document DNA breakages, serious cellular resonance effects, and other detrimental metabolic effects ([http://www.bioinitiative.org/report/wp-content/uploads/pdfs/sec15\\_2012\\_Evidence\\_Disruption\\_Modulation.pdf](http://www.bioinitiative.org/report/wp-content/uploads/pdfs/sec15_2012_Evidence_Disruption_Modulation.pdf) and [http://www.stopglobalwifi/documents/2001\\_kositsky\\_et\\_al.\\_-\\_ussr\\_review.pdf](http://www.stopglobalwifi/documents/2001_kositsky_et_al._-_ussr_review.pdf)).

**The U.S. Department of Interior (DOI)** stated, “*the electromagnetic radiation standards used by the Federal Communications Commission (FCC) continue to be based on thermal heating, a criterion now nearly 30 years out of date and inapplicable today*,” in reference to the current limits governing radiation utilized by wireless technology. The DOI letter discusses a number of studies showing that birds are harmed by low-level RF radiation associated with cell towers and other wireless technologies ([http://www.ntia.doc.gov/files/ntia/us\\_doi\\_comments.pdf](http://www.ntia.doc.gov/files/ntia/us_doi_comments.pdf)). **Furthermore, DOI required FirstNet to undergo a comprehensive NEPA review and planning program. Therefore, 5G, which will have similar widespread impacts, requires a NEPA review as well.**

**The U.S. Environmental Protection Agency** has stated, “The FCC's current exposure guidelines, as well as those of the Institute of Electrical and Electronics Engineers (IEEE) and the International Commission on Non-ionizing Radiation Protection, **are thermally based, and do not apply to chronic, nonthermal exposure**

**situations.** They are believed to protect against injury that may be caused by acute exposures that result in tissue heating or electric shock and burn. The hazard level (for frequencies generally at or greater than 3 MHz) is based on a specific absorption dose-rate, SAR, associated with an effect that results from an increase in body temperature. The FCC's exposure guideline **is considered protective of effects arising from a thermal mechanism but not from all possible mechanisms.** Therefore, the generalization by many that the guidelines protect human beings from harm by any or all mechanisms is not justified.” (emphasis added) ([http://www.emrpolicy.org/litigation/case\\_law/docs/noi\\_epa\\_response.pdf](http://www.emrpolicy.org/litigation/case_law/docs/noi_epa_response.pdf))

Non-industry funded studies have consistently found links between RF radiation and various negative biological effects ([www.bioinitiative.org](http://www.bioinitiative.org)). They include serious neurological, cardiac, and metabolic effects, as well as DNA breakage which can lead to cancer and genetic defects (<http://www.mainecoalitiontostopsmartmeters.org/?p=1469>).

Studies, including the National Toxicology Program studies, have shown wireless to be a dangerous technology and 5G, according to Chairman Wheeler's own comments, is an infrastructure intensive technology. So, invest in safe, wired infrastructure instead of spending a lot of money to saturate entire communities with hazardous radiation. The "cool" factor is not worth the peril.

It is time for the FCC to act in a precautionary way and stop promoting wireless, especially 5G. WiFi is already causing radiofrequency sickness in children and adults. The data suggests 5G is likely to be even more dangerous. No one should be forced to be exposed to a carcinogen when connectivity can be achieved in safer ways. The FCC should be completing the process of establishing meaningful biologically-based population protective RF safety limits instead of forcing people to be exposed to more RF radiation.

There are effects far beyond cancer. My family has had the misfortune to experience them firsthand. It has been a nightmare. Not only is the FCC abdicating its responsibilities by not establishing meaningful biologically protective RF safety limits before promoting further RF exposures, it is violating human rights. Please read "Wireless Technology Violates Human Rights," attached and at <http://www.electricalpollution.com/documents/WirelessViolatesHumanRights2016.pdf>. If you continue to expedite 5G, which will increase exposure to a carcinogen and pollutant with potent harmful biological activity, you will also be violating human rights and the Nuremberg Code of Ethics.

Recent scientific publications look specifically at causality, such as M.L. Pall in “*Microwave Frequency Electromagnetic Fields (EMFs) Produce Widespread Neuropsychiatric Effects Including Depression*” (J Chem Neuroanat. 2015 Aug 20; <http://www.sciencedirect.com/science/article/pii/S0891061815000599>). It discusses the causal relationship between exposure to radiation from wireless technology and neuropsychiatric effects. Mechanisms of action are also discussed. It is likely the rampant proliferation of wireless radiation (to which 5G would add greatly) is an important factor behind the marked increase in mass killings due to the detrimental psychiatric effects it can have. Many of the perpetrators were technology addicts and thus highly exposed to RF radiation. Prudence and caution would dictate a halt to the proliferation of wireless technology.

A recent study by Yakymenko, et al., 2015, *Oxidative Mechanisms of Biological Activity of Low-intensity Radiofrequency Radiation* finds in 93 of 100 reviewed studies a wide pathogenic potential of the induced Reactive Oxygen Species (ROS) and their involvement in cell signaling pathways which explains a range of biological/health effects of low intensity RF radiation, including both cancer and non-cancer pathologies. Their concluding analysis demonstrates low-intensity RF radiation is an impressive oxidative agent for living cells with a high pathogenic potential and that the oxidative stress induced by RF radiation exposure should be recognized as one of the primary mechanisms of the biological activity of this kind of radiation (<http://www.mainecoalitiontostopsmartmeters.org/wp-content/uploads/2015/07/Yakymenko-et-al-2015.pdf>).

Not only is the radiation utilized by wireless technology dangerous to people, it is dangerous to the environment. Therefore, the need for a NEPA review is triggered.

### **FCC must complete a NEPA review and EIS prior to implementing 5G**

The potential environmental and human health hazards from 5G necessitates a comprehensive NEPA review [*Env'tl. Def. Fund v. Tenn. Valley Auth.*, 468 F.2d 1164, 1174 (6th Cir. 1972)] and, specifically, a formal Environmental Impact Statement (EIS). The EIS should include a full review of environmental effects, as well as human health and safety. The FCC has an obligation to evaluate whether “*services or capabilities are essential to public health, safety, or in the public interest*” (H.R. Report No. 104-204, p. 94) and so must protect the public from possible harm caused by radiofrequency radiation.

The FCC is not entitled to essentially disregard comments that do not provide global cost-benefit analysis (*Scenic Hudson v. Federal Power Commission*). The Commission has an affirmative duty to inquire into and consider all relevant facts. The FCC must use government resources to perform the relevant analysis. The FCC should request the EPA use its National Risk Management Research Laboratory resources and experts to conduct all cost analyses necessary.

This proposal also triggers the need for a Memoranda of Understanding (MOU) with U.S. Fish and Wildlife Service under Executive Order 13186 concerning effects on migratory birds.

### **RF radiation kills and damages trees**

Trees are being killed and damaged across the U.S. and world-wide even without full-scale implementation of 5G. RF radiation is being implicated as the cause. Several studies show the very serious effects that RF radiation has on the health of trees. Trees are essential to the welfare of the global environment and the continuation of the human race. Decimation of the Amazon rainforest by direct human actions has been oft-cited as endangering the global environment. The FCC should not be moving forward with implementing a technology, 5G wireless technology, that will hasten the RF-caused death of our urban and rural forests. Please read the following papers to see the toll RF is already taking on trees. We cannot afford additional forest die-off. Large mature trees are being seriously damaged and killed. This damage will take 50 years or more to repair.

- Radiofrequency radiation injures trees around mobile phone base stations [https://www.researchgate.net/publication/306435017\\_Radiofrequency\\_radiation\\_injures\\_trees\\_around\\_mobile\\_phone\\_base\\_stations](https://www.researchgate.net/publication/306435017_Radiofrequency_radiation_injures_trees_around_mobile_phone_base_stations)
- Adverse Influence of Radio Frequency Background on Trembling Aspen Seedlings: Preliminary Observations <https://www.hindawi.com/journals/ijfr/2010/836278/>
- Tree damage in the vicinity of mobile phone base stations <http://kompetenzinitiative.net/KIT/wp-content/uploads/2016/06/Tree-damages-in-the-vicinity-of-mobile-phone-base-stations.pdf>
- The trees make it easy to recognize the effects of RF-EMF. Examples of tree damage: <http://kompetenzinitiative.net/KIT/wp-content/uploads/2016/09/Trees-in-Bamberg-and-Hallstadt-Dokumentation-2006-2016.pdf>
- Electromagnetic Fields Act Similarly in Plants as in Animals: Probably Activation of Calcium Channels via Their Voltage Sensor: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3780531/>



The damage to trees is not theoretical. We are seeing it on our farm now. We have seen it in the city for years, but now we are seeing it in the country as well, on a widespread basis.



July 24, 2016  
Note thinness in tree on right and bare spot

August 9, 2016  
Damage progressing

September 12, 2016  
More leaves lost. No sign of healthy fall leaf color so fall is not the cause.

October 10, 2016  
Still no fall color, but leaf loss nearly complete in righthand tree.



July 24, 2016

These cottonwoods trees began exhibiting damage similar to the trees above in 2015. Most of them greened up in the spring 2016, then had the leaves die and drop. Two still retain leaves low down. Others are completely dead.

As you can see the damage to trees is progressing quickly to death. Balimori discusses the fact that *"White and black poplars (Populus sp.) and willows (Salix sp.) are more sensitive. There may be a special sensitivity of this family exists or it could be due to their ecological characteristics forcing them to live near water, and thus electric conductivity."* Certainly the trees that are worst off in our area are willows and cottonwoods and they are growing in areas that are wet, but I have seen trees of all types exhibiting damage. Please think of the future. We cannot live without a healthy tree population. We rely on them for the very oxygen we breathe. **No technology is worth endangering something as essential as our source of oxygen.**



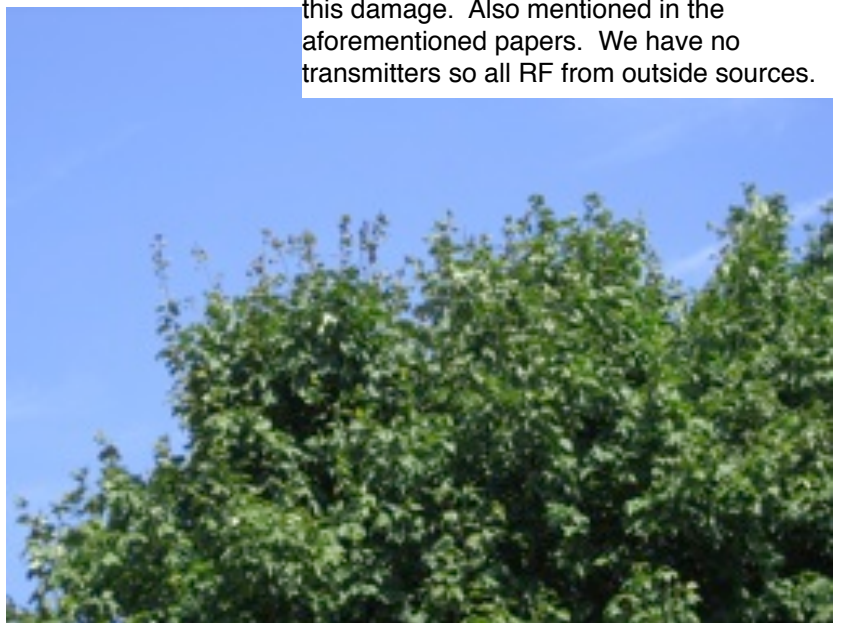
**Please halt the rollout of 5G and deny the request to preempt local zoning authority.**

September 18, 2016  
Notice uneven leaf drop, unhealthy green, and absence of fall color.  
Characteristic of RF damage



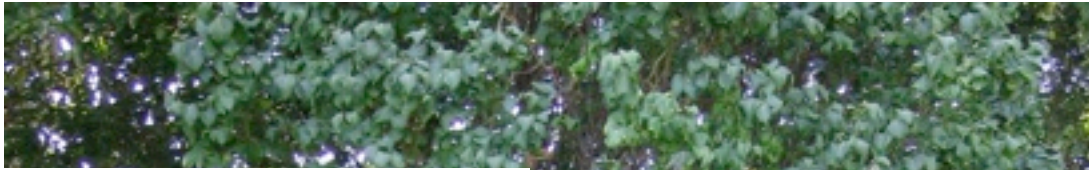
Close-up of leaves from one of the cottonwoods above. Notice necrotic lesions and off color characteristic of RF leaf damage. No normal fall color present, despite on-going leaf drop.

Note the small damaged leaves across the top of the maple below. Trees of all different species around our yard are demonstrating this damage. Also mentioned in the aforementioned papers. We have no transmitters so all RF from outside sources.





Lilac showing marked one sided damage. Signal appears to be coming from a WiFi tower on a hill about a mile away.



**Green lilac nearly touching green side of affected lilac. The bases are only 8 ft apart.  
0.6 microwatts/m<sup>2</sup> max  
no audible or visible spikes in over 5 minutes**

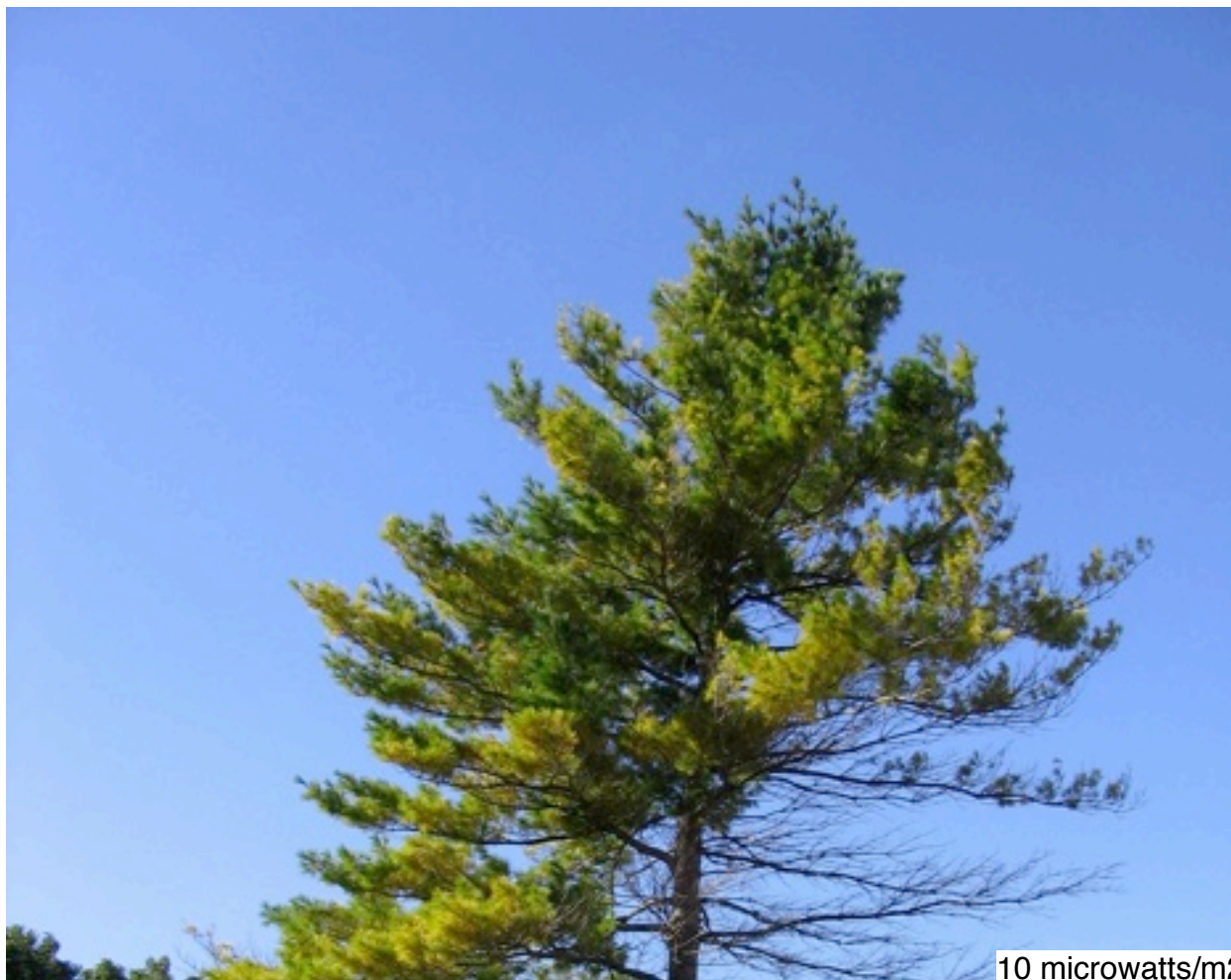


**Green side of lilac  
2.8 microwatts/m<sup>2</sup> max  
only periodic audible or visible spikes**



**Bare side of lilac  
83.5 microwatts/m<sup>2</sup> max  
audible and visible spikes every 9 seconds**





39 microwatts/m<sup>2</sup> max  
Bare spot pointing S/SW  
Line of sight to cell tower  
6 miles away

10 microwatts/m<sup>2</sup> max  
Measured near bottom of  
bare spot which points N



2.8 microwatts/m<sup>2</sup> max  
In first whorl where still has needles



Please read the following reports which demonstrate that wireless technology is causing serious harm to wildlife:

- “The Report on Possible Impacts of Communication Towers on Wildlife Including Birds and Bees” commissioned on 30th August 2010 by the Ministry of Environment and Forest, Government of India [http://www.moef.nic.in/downloads/public-information/final\\_mobile\\_towers\\_report.pdf](http://www.moef.nic.in/downloads/public-information/final_mobile_towers_report.pdf)
- “Impacts of radio-frequency electromagnetic field (RF-EMF) from cell phone towers and wireless devices on biosystem and ecosystem – a review” [http://www.biolmedonline.com/Articles/Vol4\\_4\\_2012/Vol4\\_4\\_202-216\\_BM-8.pdf](http://www.biolmedonline.com/Articles/Vol4_4_2012/Vol4_4_202-216_BM-8.pdf)
- Balmori, A. “Electromagnetic pollution from phone masts. Effects on wildlife,” Pathophysiology (2009), doi:10.1016/j.pathophys.2009.01.007 <http://www.ncbi.nlm.nih.gov/pubmed/19264463>

The Supreme Court of India ordered cell towers removed from schools, colleges, hospitals and playgrounds in Rajasthan because of radiation being “hazardous to life.” The court’s amazing 200+ page decision thoroughly reviews the worldwide evidence that cell towers are harming human beings and wildlife (<http://timesofindia.indiatimes.com/city/jaipur/No-mobile-towers-near-schools-hospitals-directs-Rajasthan-HC/articleshow/17399705.cms>).

On July 5, 2013 the Supreme Court of India upheld this decision.

Other countries around the world are also taking precautionary action to prevent further harm due to the strength of the evidence that radiation from wireless technology is harmful. Please watch this video clip (<https://www.youtube.com/watch?v=yYDmIq-nTn4>) to see how far radiation from wireless technology penetrates into the body. Please note that children are at a far higher risk. Children are our future. A technology that endangers them endangers our future and should not be promoted. Numerous foreign countries have taken precautionary action to protect their children (<http://ehtrust.org/policy/international-policy-actions-on-wireless/>). Our children deserve no less. The telecommunication industry is in a hurry to roll out their technology before the public fully realizes how dangerous it is. The FCC is supposed to be protecting the health of all Americans and should not be complicit in forcing exposure to a dangerous technology.

Steps for minimizing exposure to RF can be found at [www.electricalpollution.com](http://www.electricalpollution.com) on the Solutions page. They could be used to make the United States one of the healthiest nations on the planet.

Don't unleash a dangerous environmental pollutant on your friends, family, and, indeed, the whole country. Protect your family, friends, and the country - halt implementation of 5G and deny the request to preempt local zoning to expedite 5G. Help bring wired broadband to everyone by placing a tariff on the use of wireless and use the proceeds to fund dedicated wired broadband internet. Be on the right side of history.

Sincerely,

Catherine Kleiber